## REMARKS

Claims 1-37, 39, and 41-67 are pending after this amendment.

Applicants have amended claims 1, 9, 30, 33-36, 41, 50-52, 57, 59, 62, and 63 in order to more particularly define the invention. The amendments were not necessitated by the claim rejections. Applicants make no admission as to the patentability or unpatentability of the originally filed claims.

The amendments and remarks presented herein are in response to the Final Office Action dated March 30, 2006.

The Examiner noted several deficiencies in the Information Disclosure Statements. Copies of the supplemental Information Disclosure Statements previously submitted on January 10, 2005, and October 4, 2004, and the missing references are included herewith to correct these deficiencies.

The Examiner objected to the drawings for several reasons.

With regard to the objection that the Figures must be numbered consistently and consecutively, the Examiner incorrectly notes that the first figure is labeled "1B" and that there is no "1A". In fact, Figs. 1A and 1B are both on the same drawing sheet (sheet 1 of 13).

With regard to the objection that some Figures include photographs or poor quality reproductions, new drawings are submitted herewith to address this objection.

With regard to the objection that Figure 12 includes identification numbers located on shaded portions of the Figure, a new Figure 12 is submitted herewith to address this objection.

The Examiner objected to the specification, requiring that the status of all parent priority applications be indicated. The specification has been amended to address this objection.

The Examiner objected to claims 30, 33, and 41 because of informalities. The claims have been amended to correct these informalities.

The Examiner rejected claims 1 and 2 under 35 USC 101 as being directed to non-statutory subject matter. Specifically, the Examiner stated that claims 1 and 2 are drawn to a computer-implemented process that merely manipulates data or an abstract idea without limitation to practical application in the technological arts. The Examiner further stated that there is no useful, concrete, tangible result.

The proper test for statutory subject matter for a method claim is whether the claim produces a useful, concrete, tangible result. See, *State StreetBank & Trust Co. v. Signature Financial Group*, 149 F.3d 1368; 47 U.S.P.Q.2D (Fed. Cir. 1998), and *AT&T Corp. v. Excel Communications, Inc.*, 172 F.3d 1352, 50 USPQ2d 1447 (Fed. Cir. 1999). In *State Street*, the Court held that the "net asset value" output by computer system was a useful, concrete, tangible result. Similarly, in *AT&T*, the Court held that the deter-

mination by computer algorithm of a value for a primary long-distance service (interexchange) carrier was also a useful, concrete, and tangible result.

Claims 1 and 2 also recite useful, concrete, tangible results. Claim 1 recites "performing at least one action." The action is itself a useful, concrete, and tangible result. In order to clarify the nature of the invention, Applicants have amended claim 1 to recite "performing at least one action to cause a change to a stored document collection," thus more specifically pointing out that the action has a result, namely the change that is made to the stored document collection. An action causing a change in this manner yields a concrete result because the stored document collection is in a different state after the action has been performed. The result is tangible because it has a physical implementation that can be detected by viewing the stored document collection after the change has taken place.

Claim 2 depends from claim 1 and therefore incorporates the amended language of claim 1.

Claims 1 and 2 are therefore submitted to be directed to statutory subject matter under 35 USC 101. It is respectfully requested that the rejection under 35 USC 101 be withdrawn.

The Examiner rejected claims 1-7, 11, 12, 16, and 17 under 35 USC 102(b) as being anticipated by Dozier. This rejection is respectfully traversed.

Claim 1, which has been amended merely to more particularly point out the features of the invention, recites:

"A method of composing a collection of information comprising:
receiving a plurality of documents in an order; and
performing at least one action to cause a change to a stored document collection, wherein the at least one action is selected responsive to the order of the documents."

The claimed method thus responds to the order in which documents are received, and performs an action to cause a change to a stored document collection accordingly. An advantage of this method is that it allows a user to specify an action to be performed by simply presenting documents in a particular order.

By contrast, Dozier merely describes techniques for publishing hypermedia documents across wide area networks (WANs). Dozier describes a client-server development platform that facilitates document authoring, content-based indexing and retrieval of documents, management and control of assets, and support for developing form-driving interactive services. The main focus of Dozier is to provide tools to assist in authoring and publishing of documents and document collections.

Dozier fails to describe any technique where an action is selected and performed responsive to an order in which documents are received, as claimed herein. Rather, a user interacts with the system of Dozier via a user interface for specifying operations to be performed. See, for example, the Summary of the Invention section of Dozier:

- "The processes of accessing, editing, and storing may be performed using a seamless user interface on the client computer" (col. 3, lines 54-56, emphasis added);

- "A related feature of the invention allows convenient transfers of content and/or hypermedia links among a plurality of WAN documents, such as by 'cut and paste' or 'drag and drop' copying" (col. 3, lines 61-64, emphasis added);
- "Once again, the processes of accessing and editing are performed using a seamless user interface on a client computer" (col. 4, lines 4-6, emphasis added);

At col. 4, lines 13-16, Dozier states that "the related documents to be included in the collection are specified, and a desired operation ... may then be performed collectively on each document in the collection, simply by interactively issuing a single command corresponding to the operation." (Emphasis added). Thus, even in this context there is no hint or discussion of any technique whereby the operation is selected responsive to the order in which documents are received. In fact, Dozier teaches away from such a scheme, by stating that the user enters a command to specify the operation to be performed. Further details on user entry of such a command for operating on a document collection are provided at col. 8, lines 14-38, which explicitly state that the user specifies, via pull-down menus in a user interface, operations to be performed collectively upon the document collection: "Many of the basic operations provded by the pull-down menus ... are performed collectively upon the current document collection (or 'miniweb'); in other words, a single command will be applied to all members of the collection, as a group. For example, pull-down 'file'

menu 102 includes commands to 'save' a miniweb to any specified location in the WAN." (Col. 8, lines 19-27).

Thus, Dozier clearly contemplates user specification of a command via an on-screen user interface, and therefore teaches away from any scheme wherein actions are selected and performed responsive to the order in which documents are received.

Accordingly, Applicants respectfully submit that claim 1 is patentably distinct from Dozier.

Claim 2 depends from claim 1 and incorporates all of the limitations of claim 1. Therefore, the above arguments apply to claim 2. Furthermore, claim 2 recites that "the at least one action is selected from a group of actions." Accordingly, the claimed method provides a mechanism for selecting an action from a group of actions, where the selection is made responsive to the order of the documents. Depending on the order of the documents, different actions from the group can be selected and performed.

In connection with claim 2, the Examiner stated that Dozier, Figure 7 and col. 4 lines 11-26 teach that the document collection may be re-ordered and modified. However, the cited portions of Dozier merely discuss publishing and managing a collection of documents, including performing an operation collectively on each document in the collection. Furthermore, even if Dozier did teach re-ordering of a document collection, which is not admitted here, such a teaching would still fail to anticipate the claimed invention. As recited in the claim, the action is selected responsive to the order of the documents. This limitation of selecting an action based

on document order is entirely distinct from any notion of re-ordering of a document collection, whether or not such re-ordering is taught by Dozier.

Accordingly, Applicants respectfully submit that claim 2 is patentably distinct from Dozier.

Claim 3 depends from claim 2 and incorporates all of the limitations of claim 2. Therefore, for at least the reasons discussed above in connection with claims 1 and 2, claim 3 is submitted to be patentably distinct from Dozier.

Claim 4 recites:

> "A method of composing a collection of information comprising:
> receiving a first document;
> receiving at least one subsequent document;
> determining whether the first document includes an indicium identifying a collection;
> responsive to the determination, selecting among the actions of:
> adding the at least one subsequent document to the collection identified by the indicium; and
> creating a new collection; and
> performing the selected action."

According to the claimed method, a collection of information can be composed based on received documents. An indicium within a first document identifies a collection. Responsive to a determination as to whether the first document includes an indicium, a subsequent document is added or a new collection is created. Thus, an advantage of the claimed method is that various actions associated with composing a collection of information can be specified by the user by simply providing documents including indicia identifying collections. The user need not manually

specify what actions are desired; rather the method of the present invention selects an appropriate action based on the presence of an indicium in the first document. This saves the user's time by streamlining the process of composing a collection and reducing the amount of user effort needed.

Dozier fails to teach such a method. As discussed above, Dozier merely describes techniques for publishing hypermedia documents across wide area networks (WANs). The various tools and techniques described in Dozier operate in response to user interactions via a user interface. An example of such a user interface is discussed in Dozier at col. 8, lines 14-38, as set forth above. It is clear from these discussions that Dozier does not contemplate any scheme by which actions are selected based on indicia in received documents. In fact, Dozier's description of an on-screen user interface teaches away from the techniques and limitations recited in claim 4 of the present application.

Claims 5-7, 11, 12, 16, and 17 depend from claim 4 and incorporate all of the limitations of claim 4. Accordingly, for at least the reasons given above, these dependent claims are submitted to be patentably distinct from Dozier.

The Examiner rejected claims 18-22 and 24-27 under 35 USC 102(b) as being anticipated by Chen. This rejection is respectfully traversed.

Claim 18 recites:

> "A method for adding an annotation to a collection of information, comprising:

receiving an annotated media item identifying the collection of information;
reading the annotation from the media item; and
adding the annotation to the collection of information."

The claimed invention thus provides a mechanism for adding an annotation to a collection in a streamlined manner, with minimal effort by the user. The annotated media item identifies the collection of information to which the annotation is to be added. An advantage of such a technique is that the user need not separately input a) the annotation, and b) the collection to which the annotation is to be added. A single media item can include both.

Chen describes a document management application program that can perform various types of operations on electronic documents. Documents can be imported from a scanner, internal or external memory, or e-mail. Once a document has been imported, various types of operations can be performed.

At col. 18, lines 42-55, Chen describes an annotations utility which provides the user with the option of adding annotations to a document. However, there is no teaching in Chen of any method where the annotated media item itself identifies the collection of information to which the annotation is to be added. In fact, Chen teaches away from the technique claimed herein by stating that drag-and-drop annotations are available to insert an annotation from one document into another document. Such a teaching clearly contemplates a user interface by which the user can perform drag-and-drop operations to insert annotations. Chen therefore teaches away from any technique where annotations can be added without requiring such user action, such as by the claimed method wherein the received media item that in-

cludes the annotation and identifies the collection of information to which the annotation should be added.

Claims 19, 21, 22, and 24-27 depend from claim 18 and incorporate all of the limitations of claim 18. Accordingly, for at least the reasons given above, these dependent claims are submitted to be patentably distinct from Chen.

The Examiner rejected claims 8-10 and 13-15 under 35 USC 103 as being unpatentable over Dozier. This rejection is respectfully traversed.

Claim 8 depends from claim 4 and incorporates all of the limitations of claim 4. Accordingly, for at least the reasons given above, claim 8 is submitted to be patentably distinct from Dozier. Claim 8 further recites "for at least one of the subsequent documents, receiving a separator prior to receiving the document." The separator provides a mechanism for indicating where one document ends and the next document begins. The separator thus provides an additional useful mechanism for allowing a user to indicate which actions should be performed and to define and provide the documents on which the actions should be performed, without requiring the user to interact with a screen, keyboard, or other conventional input device. Rather, the user can specify the actions to be performed by providing documents and separators. In particular, the separator allows a user to provide several documents in one stack.

The Examiner states that Dozier teaches the association of a series of documents in a sequential order, but does not indicate where in Dozier such a teaching

can be found. In fact, none of the words "series", "sequential" or "order" even appear anywhere within Dozier (except for the phrase "in order to..."). Applicants respectfully submit that Dozier fails to provide any such teaching.

Furthermore, such a teaching, even were it to be found in Dozier, would be irrelevant to a determination of patentability of claim 8. As discussed above in connection with claim 4, Dozier fails to teach any technique for adding a document to a collection according to the specific steps recited in the claim.

The Examiner correctly states that Dozier does not expressly teach a separator, but asserts that a separator is merely a document in Dozier. On the contrary, a separator is defined in Applicant's specification as having a function of indicating where one document ends and the next document begins (paragraph [0077]). No language in Dozier provides any hint or suggestion that a "document" as contemplated by Dozier would perform such a function. In fact, Dozier describes no mechanism whatsoever for receiving a first document and at least one subsequent document as claimed herein, nor does Dozier describe any technique by which a determination could be made as to when one document ends and the next begins.

Finally, the Examiner's assertion that the separator is non-functional is incorrect. As discussed above, the separator performs a specific function and enables more rapid input of multiple documents. A conventional "document", as contemplated by Dozier, would fail to perform such a function because there would be no way to recognize the end of one document and the beginning of the next without explicit indication of such by the user.

Accordingly, claim 8 is submitted to be patentably distinct from Dozier.

Claim 9 has been amended to depend from claim 8. Accordingly, claim 9 incorporates all of the limitations of claim 8. Accordingly, for at least the reasons given above, claim 9 is submitted to be patentably distinct from Dozier.

Claims 10 and 13-15 depend from claim 4 and incorporate all of the limitations of claim 4. Accordingly, for at least the reasons given above, claims 10 and 13-15 are submitted to be patentably distinct from Dozier. Claims 10 and 13-15 further recite additional language primarily directed toward different mechanisms for receiving the document. The Examiner acknowledged that Dozier fails to teach these mechanisms, but stated that such steps are obvious.

On the contrary, the additional limitations of claims 10 and 13-15 serve to further differentiate the claimed invention from Dozier. For example, claim 10 recites that "each document comprises at least one piece of paper, and wherein receiving the document comprises scanning the at least one piece of paper." Accordingly, the present invention allows a collection of information to be composed in accordance with the user's wishes, without requiring the user to interact with a screen-based user interface. The user can simply provide a stack of pieces of paper representing a series of documents. The pieces of paper in the stack thus provide all information for performing the collection composition, including documents to be added and an indicium identifying a collection to which the document is to be added (or identifying a collection to be created). A novel feature of the invention is the use of pieces of pa-

per in this manner to provide content (documents) and instructions (indicum specifying a collection).

Nowhere in Dozier is there any hint or suggestion of such a technique, nor of any technique that would allow a user to initiate such actions in the manner claimed herein. As discussed above, Dozier clearly contemplates a system in which the user initiates commands via a user interface that includes a menu-based paradigm. There is no discussion of any technique where documents themselves identify collections to be added, or collections to be modified by addition of documents. Furthermore there is no discussion of receiving pieces of paper representing documents that contain such indicia. Finally, there is no discussion of receiving documents that contain such indicia, whether by scanning, fax, or e-mail.

The Examiner rejected claims 23 and 28-32 under 35 USC 103 as being unpatentable over Chen. This rejection is respectfully traversed.

Claim 23 and 28-32 depend from claim 18 and incorporate all of the limitations of claim 18. Accordingly, for at least the reasons given above, claims 23 and 28-32 are submitted to be patentably distinct from Chen. Claims 23 and 28-32 recite additional limitations that further distinguish them from the teachings of Chen.

For example, claim 23 recites that "receiving the annotated media item comprises receiving a fax transmission including the item." A user can therefore fax an annotated media item to a designated destination, where the media item identifies a collection of information. The annotation can then be automatically read from the

fax and added to the collection. There is no need for the user to perform any additional actions or operations beyond simply faxing the media item. An advantage of the claimed invention is improved ease-of-use by reducing the burden on the user.

The Examiner correctly points out that Chen does not teach receipt of documents through fax transmission. Although Chen mentions importing electronic documents from different sources, there is no teaching or suggestion of receiving documents that both a) contain annotations and b) identify a collection of information to which the annotation should be added. Thus, Chen would not be able to provide the distinct advantages conferred by the claimed invention.

Claims 28-32 recite specific mechanisms for reading the annotation from the media item. As discussed above, Chen fails to describe any technique by which annotations are read from a media item, where the media item identifies a collection to which the annotation should be added. Therefore, Applicants respectfully submit that claims 28-32 are patentably distinct from Chen.

The Examiner rejected claims 33-67 under 35 USC 103 as being unpatentable over the combination of Dozier, MacPhail, and Bergen. This rejection is respectfully traversed.

Claim 33 has been amended to include the limitations of claim 40. Claim 33 now recites:

> "A method of providing differentiated access to a collection of information, the method comprising:

generating a first pointer to a collection of information, the first pointer further specifying a first access level from a plurality of access levels;
generating a second pointer to the collection, the second pointer specifying a second access level different from the first access level; and
outputting a representation of at least one of the pointers."

Claim 41 has been amended to place it in independent form and to include additional limitations. Claim 41 now recites:

"A method of providing differentiated access to a collection of information, the method comprising:
generating a first pointer to a collection of information, the first pointer further specifying a first access level from a plurality of access levels;
generating a first machine-readable indicium representing the first pointer;
generating a second pointer to the collection, the second pointer specifying a second access level different from the first access level;
generating a second machine-readable indicium representing the second pointer;
outputting a first document including the first machine-readable indicium ; and
outputting a second document including the second machine-readable indicium."

By generating two pointers to the same collection of information, the claimed method provides a convenient mechanism for providing at least two different access levels. A first pointer specifies a first access level, and a second pointer specifies a second, different access level. A representation of at least one of the pointers is output. In this manner, a selected pointer representation can be given to an individual, depending on which access level is appropriate for that individual. The possession of a particular pointer representation is thus an indication and potentially an enforcement mechanism for differentiated access to an information collection.

None of the cited references, taken alone or in any combination, teaches or discloses the method of claim 33 or of claim 41. Dozier merely describes techniques

for publishing hypermedia documents across wide area networks (WANs), as discussed above. MacPhail merely describes methods of selecting document objects for documents stored in a folder format. Bergen merely describes a system of managing printing system meory by altering a state of a printing system subsystem by reference to a substrate including a machine-readable code.

Nowhere in any of the references is there any hint or suggestion of generating two pointers to a document collection, each pointer specifying a different access level. The Examiner states that repeating the step of generating the access code at a different level is inherent in the ability to generate the access code at any level, and that repeated the step at different levels is not patentably distinct from generating the access code at one level. On the contrary, the claimed method step of generating two pointers to the same collection, where the two pointers specify different access levels, is not found in any of the cited references and is not made obvious by any of the cited references. The particular claimed steps, taken in combination as claimed, provide unique advantages in that they facilitate a streamlined, easy-to-use mechanism for providing different levels of access to different individuals. An advantage of the claimed invention is that each pointer, on its own, identifies both the collection of information and the appropriate access level to be granted for the recipient of the pointer; generating two such pointers provides an easy way to identify such information for two potential users having different access levels. This advantage, among others, would not be conferred by any of the cited references, whether taken alone or combined in the manner suggested by the Examiner.

Accordingly, claims 33 and 41 are submitted to be patentably distinct from Dozier, MacPhail, and Bergen, taken alone or in any combination.

Claims 34-37, 39, and 44-55 depend from claim 33 and incorporate all of the limitations of amended claim 33. Claims 42 and 43 depend from claim 41 and incorporate all of the limitations of amended claim 41.

Claim 62 is a computer program product claim that, as amended, recites limitations similar to those of amended claim 33.

Claim 63 is a system claim that, as amended, recites limitations similar to those of amended claim 33.

Accordingly, for at least the reasons given above, claims 34-37, 39, 44-45, and 62-63 are submitted to be patentably distinct from Dozier, MacPhail, and Bergen, taken alone or in any combination.

Claims 38 and 40 have been cancelled.

Claim 56 recites:

> "A method of providing differentiated access to a collection of information, the method comprising:
>
> receiving a first document comprising a first machine-readable indicium representing a first pointer to a collection of information, the first pointer specifying a first access level for accessing the collection;
>
> generating a second pointer to the collection, the second pointer specifying a second access level different from the first access level;
>
> generating a second machine-readable indicium representing the second pointer; and
>
> outputting a second document including the second machine-readable indicium."

The method of claim 56 receives a first document and outputs a second document. The first document has an indicium representing a first pointer to a collection of information. The indicium specifies a first access level. According to the claimed method, a second pointer to the same collection is generated, but having a second access level different from the first access level. A second indicium is generated, so that the second document includes the second indicium. In this manner, the second document provides a different access level than did the first document.

The Examiner did not provide any explanation for the rejection of claim 56, other than to state that claim 56 incorporates substantially similar subject matter as claimed in claim 41. Applicants respectfully submit that the specific steps recited in claim 56 are different than those of claim 41, and that the Examiner's rationale for rejecting claim 41 does not apply to claim 56. For example, claim 41 does not recite any step for receiving a first document comprising a machine readable indicium.

Nevertheless, Applicants have reviewed Dozier, MacPhail, and Bergen and compared them with the claimed method, and have found that no such method is taught or suggested in any of the cited references, taken alone or in any combination.

Claim 57, which has been amended merely to clarify the invention, recites:

> "A method of providing differentiated access to a collection of information, the method comprising:
>
> receiving a selection of a first access level for a first recipient from a plurality of access levels;
>
> receiving a selection of a second access level, different from the first access level, for a second recipient from a plurality of access levels;

generating a first machine-readable indicium pointing to a collection of information, the first indicium further indicating the first access level;

generating a second machine-readable indicium pointing to the same collection of information, the second indicium further indicating the second access level;

outputting a first document including the generated first machine-readable indicium; and

outputting a second document including the generated second machine-readable indicium."

By generating two machine-readable indicia to the same collection of information, the claimed method provides a convenient mechanism for providing at least two different access levels. A first machine-readable indicium indicates a first access level, and a second machine-readable indicium indicates a second access level. Both indicia point to the same collection of information. Two documents are output, one including the first machine-readable indicium and the other including the second machine-readable indicium. In this manner, access to the document collection can be controlled by distributing the first or second document to appropriate individuals. One or the other document can be given to an individual, depending on which access level is appropriate for that individual. The possession of a particular document including a machine-readable indicium is thus an indication and potentially an enforcement mechanism for differentiated access to an information collection.

None of the cited references, taken alone or in any combination, teaches or discloses the method of claim 57. As discussed above, Dozier merely describes techniques for publishing hypermedia documents across wide area networks (WANs). MacPhail merely describes methods of selecting document objects for documents stored in a folder format. Bergen merely describes a system of managing printing

system memory by altering a state of a printing system subsystem by reference to a substrate including a machine-readable code.

Nowhere in any of the references is there any hint or suggestion of generating two machine-readable indicia pointing to a document collection, each indicium specifying a different access level. The claimed method step of generating two machine-readable indicia pointing to the same collection, where the two indicia specify different access levels, is not found in any of the cited references and is not made obvious by any of the cited references. The particular claimed steps, taken in combination as claimed, provide unique advantages in that they facilitate a streamlined, easy-to-use mechanism for providing different levels of access to different individuals. An advantage of the claimed invention is that each indicium, on its own, identifies both the collection of information and the appropriate access level to be granted for the recipient of the document that includes the indicium; generating two such indicia provides an easy way to identify such information for two potential users having different access levels. This advantage, among others, would not be conferred by any of the cited references, whether taken alone or combined in the manner suggested by the Examiner.

Accordingly, claim 57 is submitted to be patentably distinct from Dozier, MacPhail, and Bergen, taken alone or in any combination.

Claim 58 depends from claim 57 and incorporates all of the limitations of amended claim 57. Accordingly, for at least the reasons given above, claim 58 is sub-

mitted to be patentably distinct from Dozier, MacPhail, and Bergen, taken alone or in any combination.

Claim 59, which has been amended merely to clarify the invention, recites:

> "A method of providing differentiated access to a collection of information, the collection comprising a plurality of items, the method comprising:
> receiving a selection of a first access level for a first subset of items in the collection;
> receiving a selection of a second access level, different from the first access level, for a second subset of items in the collection;
> generating a machine-readable indicium pointing to the collection, the indicium further indicating the first access level for the first subset of items and the second access level for the second subset of items; and
> outputting a document including the generated machine-readable indicium."

The claimed method thus provides a convenient mechanism for providing at least two different access levels for different subsets of items in a collection of information. A machine-readable indicium points to the collection and indicates both access levels. In this manner, access to various items within the collection can be carefully controlled at different levels.

None of the cited references, taken alone or in any combination, teaches or discloses the method of claim 59. As discussed above, Dozier merely describes techniques for publishing hypermedia documents across wide area networks (WANs). MacPhail merely describes methods of selecting document objects for documents stored in a folder format. Bergen merely describes a system of managing printing system memory by altering a state of a printing system subsystem by reference to a substrate including a machine-readable code.

Nowhere in any of the references is there any hint or suggestion of generating a machine-readable indicia that points to a document collection and also indicates two different access levels for different subsets of items in the collection. An advantage of the claimed invention is that different access levels can be indicated with a single machine-readable indicium. This advantage, among others, would not be conferred by any of the cited references, whether taken alone or combined in the manner suggested by the Examiner.

Accordingly, claim 59 is submitted to be patentably distinct from Dozier, MacPhail, and Bergen, taken alone or in any combination.

Claims 60 and 61 depend from claim 59 and incorporate all of the limitations of amended claim 59. Accordingly, for at least the reasons given above, claims 60 and 61 are submitted to be patentably distinct from Dozier, MacPhail, and Bergen, taken alone or in any combination.

Claim 64 recites:

> "A file for specifying access levels, comprising:
> at least two resource identifier paths; and
> for each of the resource identifier paths, an indication of access rights;
> wherein the access rights for a first resource identifier path differ from the access rights for a second resource identifier path pointing to the same resource."

The claimed invention is a file that provides at least two sets of access rights to the same resource by including at least two resource identifier paths. An advantage of such an invention is that the resource paths indicate the access rights, so that any

interaction with the resource via the resource identifier path can inherently impose the access rights on the entity performing the interaction.

The Examiner did not provide any explanation for the rejection of claim 64, other than to state that claim 64 incorporates substantially similar subject matter as claimed in claim 41. Applicants respectfully submit that the specific limitations recited in claim 64 are different than those of claim 41, and that the Examiner's rationale for rejecting claim 41 does not apply to claim 64. For example, claim 41 does not recite resource identifier paths, nor does it recite any relationship between such paths and access rights.

Nevertheless, Applicants have reviewed Dozier, MacPhail, and Bergen and compared them with the claimed invention, and have found that there is no hint or suggestion of any technique for specifying access rights in the manner claimed. Specifically, there is no mention whatsoever of two resource identifier paths, each having different access rights but pointing to the same resource.

Claims 65-67 depend from claim 64 and incorporate all of the limitations of amended claim 64. Accordingly, for at least the reasons given above, claims 65-67 are submitted to be patentably distinct from Dozier, MacPhail, and Bergen, taken alone or in any combination.

On the basis of the above amendments, consideration of this application and the early allowance of all claims herein are requested.

Should the Examiner wish to discuss the above amendments and remarks, or if the Examiner believes that for any reason direct contact with Applicants' representative would help to advance the prosecution of this case to finality, the Examiner is invited to telephone the undersigned at the number given below.

Respectfully submitted,
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Dated: Jun 9/06

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